



PRIVACY IMPACT ASSESSMENT: SAVANNAH RIVER NUCLEAR SOLUTIONS (SRNS)
ENERGY EMPLOYEES OCCUPATIONAL ILLNESS
COMPENSATION PROGRAM ACT (EEOICPA)
PIA Template Version 3 – May, 2009

Department of Energy
Privacy Impact Assessment (PIA)

| | |
|--------------------------------------|----------|
| Affects Members Of the Public? | X |
|--------------------------------------|----------|

Guidance is provided in the template. See DOE Order 206.1, *Department of Energy Privacy Program*, Appendix A, Privacy Impact Assessments, for requirements and additional guidance for conducting a PIA: <http://www.directives.doe.gov/pdfs/doe/doetext/neword/206/o2061.pdf>

Please complete electronically: no hand-written submissions will be accepted.

This template may not be modified.

MODULE I – PRIVACY NEEDS ASSESSMENT

| | | |
|--|---|---|
| Date | February 9, 2010 | |
| Departmental Element & Site | Office of Environment Management Department of Energy – Savannah River Operations Office | |
| Name of Information System or IT Project | Savannah River Nuclear Solution (SRNS) Energy Employees Occupational Illness Compensation Program Act (EEOICPA) | |
| Exhibit Project UID | UPI Code: 019-10-01-15-01-1057-00 | |
| New PIA <input type="checkbox"/> | | |
| Update <input checked="" type="checkbox"/> | | |
| | Name, Title | Contact Information Phone, Email |
| System Owner | Karen T. Brown, Manager, EEOICPA Program Savannah River Nuclear Solutions | (803) 725-0323 karent.brown@srs.gov |
| Local Privacy Act Officer | Pauline Conner, Privacy Act Officer | (803) 952-8134 pauline.conner@srs.gov |
| Cyber Security Expert reviewing this document (e.g. ISSM, CSSM, ISSO, etc.) | Jannett M. Moran, Cyber Security Manager, Savannah River Nuclear Solutions | (803) 725-6925 jan.moran@srs.gov |



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MODULE I – PRIVACY NEEDS ASSESSMENT

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| Person Completing this Document | Pauline Conner, Privacy Act Officer | (803) 952-8134 pauline.conner@srs.gov |
| Purpose of Information System or IT Project | As part of the Energy Employees Occupational Illness Compensation Program Act (EEOICPA) of 2000, the Savannah River Site (SRS) must respond to requests for employee records from the Department of Labor (DOL) and the Department of Health and Human Services (DHHS), National Institute for Occupational Safety and Health (NIOSH). The purpose of the EEOICPA Database is to track receipt of requests from these agencies and to monitor SRS responses to the requests. The database is used provide statistical reports when requested by management and the Department of Energy (DOE). | |
| Type of Information Collected or Maintained by the System: | <input checked="" type="checkbox"/> SSN <input checked="" type="checkbox"/> Medical & Health Information <input type="checkbox"/> Financial Information <input type="checkbox"/> Clearance Information <input type="checkbox"/> Biometric Information <input type="checkbox"/> Mother's Maiden Name <input checked="" type="checkbox"/> DoB, Place of Birth <input checked="" type="checkbox"/> Employment Information <input type="checkbox"/> Criminal History <input checked="" type="checkbox"/> Name, Phone, Address <input type="checkbox"/> Other – Please Specify | |
| Has there been any attempt to verify PII does not exist on the system? DOE Order 206.1, <i>Department of Energy Privacy Program</i> , defines PII as any information collected or maintained by the Department about an individual, including but not limited to, education, financial transactions, medical history and criminal or employment history, and information that can be used to | No Based on existing system documentation and available data dictionaries, it is known that PII exists in the Information Systems covered by this Privacy Impact | |



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distinguish or trace an individual's identity, such as his/her name, Social Security number, date and place of birth, mother's maiden name, biometric data, and including any other personal information that is linked or linkable to a specific individual.

Assessment.

If "Yes," what method was used to verify the system did not contain PII? (e.g. system scan)

N/A

Threshold Questions

1. Does system contain (collect and/or maintain), or plan to contain any information about individuals?

YES

2. Is the information in identifiable form?

YES

3. Is the information about individual Members of the Public?

YES

4. Is the information about DOE or contractor employees?

YES

☒ Federal Employees
☒ Contractor Employees

If the answer to **all** four (4) Threshold Questions is "No," you may proceed to the signature page of the PIA. Submit the completed PNA with signature page to the CPO.

Module II must be completed for all systems if the answer to any of the four (4) threshold questions is "Yes." All questions must be completed. If appropriate, an answer of N/A may be entered.

The goal of the threshold questions is to legitimately and efficiently determine whether additional assessment is necessary. If there is doubt, it is in the System Owner's best interest to complete Module II.

PIAs affecting Members of the Public are posted on the DOE Privacy website. For this reason, PIAs affecting Members of the Public should be written in plain language and at a high level so they are easily understandable and do not disclose sensitive information.

END OF PRIVACY NEEDS ASSESSMENT



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MODULE II – PII SYSTEMS & PROJECTS

AUTHORITY, IMPACT & NOTICE

1. AUTHORITY

What specific authorities authorize this system or project, and the associated collection, use, and/or retention of personal information?

Department of Energy Organization Act of 1977 (42 U.S.C. 7101 et seq.); Export Administrative Act of 1979 (50 U.S.C. 2401 et seq.); The Energy Employees Occupational Illness Compensation Program Act of 2000, Pub. L. 106-398; 42 U.S.C. 7151 and 7297; and 42 U.S.C. 2201(c), 2201(l)(3), 5813 and 5817.

As provided in DOE O 206.1, "The Privacy Act allows an agency to maintain information about an individual that is relevant and necessary to the purpose of the agency as required by statute or by Executive Order of the President."

2. CONSENT

What opportunities do individuals have to decline to provide information (e.g. where providing information is voluntary) or to consent only to particular uses of the information (other than required or authorized uses)?

The individuals voluntarily provide the information for the EEOICPA system to allow the authorized employees to assist them with filing EEOICPA claims for conditions that may be due to exposures during employment by or for DOE. Access to or use of the information provided will be limited to authorized individuals for required management and reporting.

3. CONTRACTS

Are contractors involved with the design, development and maintenance of the system? If yes, was the Privacy Order CRD or Privacy Act clauses included in their contracts?

Yes. Contractors are involved in the configuration, implementation, and maintenance of the system. Personal information may be disclosed to these contractors and their officers and employees in performance of their contracts. Those individuals provided this type of information is subject to the same limitations applicable to DOE officers and employees under the Privacy Act, 5 U.S.C. 552a.

Pertinent contract language states that data covered by the Privacy Act may be disclosed to contractors and their officers and employees. Any information that is obtained or viewed shall be on a need-to-know basis. Contractors are required to safeguard all information that they may obtain in accordance with the provisions of the Privacy Act and the requirements of the DOE. The contractor shall ensure that all DOE documents and software processed, and the information contained therein, are protected from unauthorized use and mishandling by assigned personnel.



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MODULE II – PII SYSTEMS & PROJECTS

4. IMPACT ANALYSIS:

How does this project or information system impact privacy?

The potential impact is MODERATE. The loss of confidentiality, integrity, or availability could be expected to have a serious adverse effect on organizational operations, organizational assets, or individuals. Adverse effects on individuals may include, but are not limited to, loss of the privacy to which individual are entitled under law.

Security Plan, Version 0, dated May 30, 2007

Date of Accreditation: June 8, 2007

5. SORNs

How will the data be retrieved? Can PII be retrieved by an identifier (e.g. name, unique number or symbol)?

If yes, explain, and list the identifiers that will be used to retrieve information on the individual.

Yes. The EEOICPA system can retrieve data by using name, social security number in conjunction with the name of the individual and location of employment.

6. SORNs

Has a Privacy Act System of Records Notice (SORN) been published in the *Federal Register*?

If "Yes," provide name of SORN and location in the *Federal Register*.

Yes. DOE-10, "Energy Employees Occupational Illness Compensation Program Act Files"

Federal Register Vol. 74, No. 6/Friday, January 9, 2009 (pages 1008-1010 and 1088-1090)

7. SORNs

If the information system is being modified, will the SORN(s) require amendment or revision?

N/A

DATA SOURCES



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| 8. What are the sources of information about individuals in the information system or project? | The system collects information from EEOICPA claims provided by the Department of Labor (DOL) and National Institute for Occupational Safety and Health (NIOSH). |
| 9. Will the information system derive new or meta data about an individual from the information collected? | No |
| 10. Are the data elements described in detail and documented? | Yes. The vendor's database describes and documents the data elements. |
| DATA USE | |
| 11. How will the PII be used? | The authorized employees will use the PII to search for employee records requested by the Department of Labor (DOL) or National Institute for Occupational Safety and Health (NIOSH). |
| 12. If the system derives meta data, how will the new or meta data be used? Will the new or meta data be part of an individual's record? | N/A |
| 13. With what other agencies or entities will an individual's information be shared? | The Department of Labor and National Institute for Occupational Safety Health may share the individual's information. |
| Reports | |
| 14. What kinds of reports are produced about individuals or contain an individual's data? | The authorized user will generate reports summarizing claim status. |
| 15. What will be the use of these reports? | The use of the data is relevant and necessary to administer the EEOICPA Program. |



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| 16. Who will have access to these reports? | Only authorized individuals will have access to the information based on need-to-know and the principle of least privilege. |
| Monitoring | |
| 17. Will this information system provide the capability to identify, locate, and monitor individuals? | No. The EEOICPA system does not have the capability to identify, locate, and monitor individuals. |
| 18. What kinds of information are collected as a function of the monitoring of individuals? | N/A |
| 19. Are controls implemented to prevent unauthorized monitoring of individuals? | N/A |
| DATA MANAGEMENT & MAINTENANCE | |
| 20. How will records about individuals be kept current and verified for accuracy, relevance and completeness? Include PII data collected from sources other than DOE records. | EEOICPA does not verify the accuracy, relevance, and completeness of the data related to the public. EEOICPA collects basic data directly from the individual to whom it pertains. Therefore, it is determined that the information is accurate, timely and complete at the time it was provided. |
| 21. If the information system is operated in more than one site, how will consistent use of the information be ensured at all sites? | The system is licensed by and operated for the U.S. Department of Energy Savannah River Operations Office. |
| Retention & Disposition | |
| 22. What are the retention periods of data in the information system? | Retention periods are in accordance with National Archives and Records Administration (NARA) and DOE records schedules. Information can be obtained at http://cio.energy.gov/records-management/adminrs.htm . |
| 23. What are the procedures for disposition of the data at the end of the retention period? | Procedures for disposition are documented in applicable NARA and DOE records schedule. Information can be obtained at http://cio.energy.gov/records-management/adminrs.htm . |



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MODULE II – PII SYSTEMS & PROJECTS

ACCESS, SAFEGUARDS & SECURITY

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| 24. What controls are in place to protect the data from unauthorized access, modification or use? | Technical and administrative controls are in place to prevent the misuse of data by individuals with access. The administrative controls include annual training emphasizing that it is the individual's responsibility to protect data that they have access to, and that misuse of that data will not be tolerated. The technical controls include restricted access via user-id and password based on user responsibility and job function. |
| 25. Who will have access to PII data? | Only authorized individuals will have access to the information based on need-to-know and the principle of least privilege. Furthermore, the appropriate local, and state and federal agencies may have access to certain records maintained in the EEOICPA to ensure Departmental compliance with other regulatory requirements. |
| 26. How is access to PII data determined? | The system owner determines who has access. Access to data is on a need-to-know basis in accordance with the job roles and responsibilities of individuals. |
| 27. Do other information systems share data or have access to the data in the system? If yes, explain. | No |
| 28. For connecting information systems, is there an Interconnection Security Agreement (ISA) or other agreement between System Owners to ensure the privacy of individuals is protected? | N/A |
| 29. Who is responsible for ensuring the authorized use of personal information? | The system owner for other systems to have access to data within the EEOICPA application must grant permission. Once provided, it is the responsibility of the other system owners to protect the data provided by EEOICPA. |

END OF MODULE II